Department of Legislative Services

Maryland General Assembly 2015 Session

FISCAL AND POLICY NOTE Revised

House Bill 360 Judiciary (Delegate Vallario, et al.)

Judicial Proceedings

Criminal Procedure - Seizure and Forfeiture

This bill (1) makes several changes to statutes pertaining to seizure and forfeiture of property in connection with violations of the State's controlled dangerous substances laws; (2) requires law enforcement agencies to report specified seizure and forfeiture data; and (3) requires the Maryland Statistical Analysis Center (MSAC) and the Governor's Office of Crime Control and Prevention (GOCCP) to compile and submit an annual report on seizure and forfeiture activity in the State during specified years.

The reporting requirements terminate September 30, 2018.

Fiscal Summary

State Effect: General fund expenditures increase by at least \$95,300 in FY 2016 for State agencies to comply with the bill's reporting requirements; the increase in general fund expenditures from compliance with the bill terminates in FY 2018 or 2019, as discussed below. MSAC's costs may be offset by an increase in general fund revenues from any fees assessed by MSAC to recoup its costs. Other State agencies' costs may be offset to the extent forfeiture proceeds are used for those purposes. General fund revenues decrease to the extent that the bill's changes to the seizure and forfeiture process decrease general fund revenues from forfeitures in controlled dangerous substances cases.

(in dollars)	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020
GF Revenue	(-)	(-)	(-)	(-)	(-)
GF Expenditure	\$95,300	\$104,300	\$98,100	\$17,200	\$0
Net Effect	(\$95,300)	(\$104,300)	(\$98,100)	(\$17,200)	\$0

Note:() = decrease; GF = general funds; FF = federal funds; SF = special funds; - = indeterminate effect

Local Effect: Local revenues decrease to the extent that the bill's changes to the seizure and forfeiture process decrease local revenues from forfeitures in controlled dangerous substances cases. Local expenditures may increase from FY 2016 through 2018 for local law enforcement agencies to comply with the bill's reporting requirements, including payment of any fees imposed by MSAC. While these costs may be offset by the use of proceeds from forfeitures for this purpose, the extent to which this may occur and the extent to which local governments use these proceeds for other purposes cannot be reliably projected. Thus, local law enforcement agencies may be negatively affected. This bill may impose a mandate on a unit of local government.

Small Business Effect: None.

Analysis

Bill Summary:

Property Subject to Forfeiture: The bill repeals the statutory provision that money or weapons that are found in close proximity to a contraband controlled dangerous substance, controlled paraphernalia, or forfeitable records of the importation, manufacture, or distribution of controlled dangerous substances are contraband and presumed to be forfeitable. The bill also removes the burden on the claimant of seized money or weapons to rebut this presumption.

Forfeiture Procedures: The bill alters the burden of proof by requiring that the State prove, by a preponderance of the evidence, that the violation of the controlled dangerous substance law was committed with the owner's actual knowledge before the following property or an interest in the following property can be forfeited: (1) conveyances used or intended to be used to transport controlled dangerous substances or specified activity related to controlled dangerous substance violations; (2) real property; and (3) everything of value furnished or intended to be furnished in exchange for a controlled dangerous substance in violation of the controlled dangerous substance law, all proceeds traceable to the exchange, and all negotiable instruments and securities used, or intended to be used to facilitate any violation of the controlled dangerous substance law.

Under current law, this property is subject to forfeiture unless the owner proves, by a preponderance of the evidence, that the violation was committed without the owner's actual knowledge.

The bill also prohibits a seizing authority or prosecuting authority from directly or indirectly transferring seized property to a federal law enforcement authority or agency unless the case is prosecuted in the federal court system under federal law.

The bill establishes that a claimant's property is subject to forfeiture if the State establishes, by clear and convincing evidence, that the claimant violated specified provisions of the controlled dangerous substance law or attempted or conspired to violate the controlled dangerous substance law. Accordingly, the bill repeals the rebuttable presumption and the claimant's burden of proof to rebut that presumption.

Required Reporting and Annual Report: The bill requires (1) law enforcement agencies to report specified seizure and forfeiture information; (2) MSAC to compile information submitted by law enforcement agencies; and (3) GOCCP to submit an annual report on the submitted information. These requirements terminate on September 30, 2018.

More specifically, on an annual basis, each law enforcement agency in the State must report specified information about each individual seizure and forfeiture completed by the agency under State and federal forfeiture law. Among other things, the data that must be reported includes (1) the type of property seized; (2) the type of alleged crime associated with the seizure; (3) the venue for the action; (4) the market value of the property; (5) whether the procedure was a criminal forfeiture or civil forfeiture; (6) the outcome of related criminal action (including whether charges were brought, a plea bargain was reached, a conviction was obtained, or an acquittal was issued); (7) the total administrative and other expenses deducted as part of the forfeiture process; (8) the gross and net amounts received from the forfeiture; and (9) the disposition of the property following seizure (including whether the property was returned to the owner, destroyed, or sold or retained after forfeiture). The report must also contain data on expenditures of forfeiture funds by the law enforcement agency, including funds spent on several specified activities.

MSAC, within GOCCP, may require a law enforcement agency to provide relevant information not specified in the bill. Each law enforcement agency must file the required report with MSAC for the law enforcement agency and the corresponding prosecutor's office. The law enforcement agency must file separate reports for forfeitures completed under State forfeiture law and federal forfeiture law. A "null" report must be filed when a law enforcement agency did not engage in seizures or forfeitures during the reporting period.

MSAC must develop a standard form, a process, and deadlines for electronic data entry for annual submission of forfeiture data by law enforcement agencies. MSAC must compile the submissions and issue an aggregate report of all forfeitures in the State. By March 1 of each year, MSAC must make available on MSAC's website the reports submitted by law enforcement agencies and MSAC's aggregate report.

GOCCP must submit the aggregate report to the Governor, the General Assembly, and each law enforcement agency before September 1 of each year. GOCCP may include, with MSAC's aggregate report, recommendations to the legislature to improve forfeiture statutes to better ensure that forfeiture proceedings are reported and handled in a manner

that is fair to crime victims, innocent property owners, secured interest holders, citizens, and taxpayers.

If a law enforcement agency fails to comply with the bill's reporting provisions, GOCCP must report the noncompliance to the Police Training Commission (PTC). PTC must contact the law enforcement agency and request that the agency comply with the required reporting provisions. If the law enforcement agency fails to comply with the required reporting provisions within 30 days after being contacted by PTC, GOCCP, and PTC jointly must report the noncompliance to the Governor and the Legislative Policy Committee.

MSAC may recoup its costs by charging a fee to law enforcement agencies that engage in seizures or forfeitures during the reporting period. A law enforcement agency may use forfeiture proceeds to pay the cost of compiling and reporting data, including any fee imposed by MSAC.

Current Law: While several provisions of State law may provide for the seizure and forfeiture of property under certain circumstances, one primary example of property that is subject to forfeiture is property seized in connection with a violation of the controlled dangerous substances law. Seizures and forfeitures are subject to extensive procedural requirements, as specified in statute.

Property Subject to Seizure: A Schedule I substance must be seized and summarily forfeited to the State if the substance is (1) possessed, transferred, sold, or offered for sale in violation of the law or (2) possessed by the State and its owner is not known. A plant may be seized and summarily forfeited if it is one from which a Schedule I or Schedule II substance may be derived and it (1) has been planted or cultivated in violation of the law; (2) has an unknown owner or cultivator; or (3) is a wild growth.

Property Subject to Forfeiture: The following are subject to forfeiture:

- (1) controlled dangerous substances manufactured, distributed, dispensed, acquired, or possessed in violation of the controlled dangerous substances law;
- raw materials, products, and equipment used, or intended for use, in manufacturing, compounding, processing, delivering, importing, or exporting a controlled dangerous substance in violation of the controlled dangerous substances law;
- (3) property used or intended for use as a container for property described above;
- (4) conveyances, including aircraft, vehicles, or vessels used or intended to be used to transport, or facilitate the transportation, sale, receipt, possession, or concealment of property described items (1) or (2);

- (5) books, records, and research, including formulas, microfilm, tapes, and data used or intended for use in violation of the controlled dangerous substances law;
- (6) money or weapons used or intended to be used in connection with the unlawful manufacture, distribution, dispensing, or possession of a controlled dangerous substance or controlled paraphernalia;
- (7) drug paraphernalia;
- (8) controlled paraphernalia;
- (9) the remaining balance of the proceeds of a sale by a holder of an installment sale agreement of goods seized;
- (10) real property; and
- (11) everything of value furnished, or intended to be furnished, in exchange for a controlled dangerous substance in violation of the controlled dangerous substances law, all proceeds traceable to the exchange, and all negotiable instruments and securities used, or intended to be used, to facilitate any violation of the controlled dangerous substances law.

Money or weapons that are found in close proximity to a contraband controlled dangerous substance, controlled paraphernalia, or forfeitable records of the importation, manufacture, or distribution of controlled dangerous substances are contraband and presumed to be forfeitable. A claimant of money or weapons has the burden to rebut this presumption.

Conditions Excluding Property from Forfeiture: Property or an interest in conveyances, real property, everything of value furnished or intended to be furnished in exchange for a controlled dangerous substance, all proceeds traceable to the exchange, and all applicable negotiable instruments and securities used or intended to be used to facilitate a controlled dangerous substances violation may not be forfeited if the owner establishes by a preponderance of the evidence that the violation of the controlled dangerous substances law was committed without the owner's actual knowledge. Additional exclusions apply to conveyances used as a common carrier or vehicle for hire, conveyances forfeited when a person other than the owner illegally possessed the conveyance, real property associated with specified controlled dangerous substance violations, and property used as the principal family residence.

Forfeiture of Ownership Interest in Property: There is a rebuttable presumption that property or part of a property in which a person has an ownership interest is subject to forfeiture as proceeds, if the State establishes by clear and convincing evidence that:

- the person has violated specified statutory provisions pertaining to controlled dangerous substances or has attempted or conspired to violate State controlled dangerous substances laws;
- the property was acquired by the person during the violation or within a reasonable time after the violation; and
- there was no other likely source for the property.

A claimant of the property has the burden of proof to rebut the presumption. Real property used as the principal family residence may not be forfeited unless an owner of the real property (1) was convicted of one of a list of specified crimes or (2) was not convicted, but failed to appear for a required court appearance and failed to surrender to the jurisdiction of the court within 180 days after the required court appearance.

Background: Asset forfeiture programs exist nationwide at the federal, State, and local levels. Forfeitures typically fall into two categories – criminal forfeiture and civil forfeiture.

Criminal forfeiture actions are brought against a criminal defendant. In criminal forfeiture, the government must prove beyond a reasonable doubt that the property in question was used for or derived from the underlying crime. Criminal forfeitures occur after an individual has been convicted; an action is then brought against the individual, to which civil liberty protections apply.

Civil forfeiture actions are brought against property, not people. In fact, under civil forfeiture, criminal charges do not need to be brought against the owner of the property, and the government can pursue property even if the property owner was not involved in the underlying crime. Civil forfeitures occur irrespective of a conviction; an action is brought against an individual's property, to which civil liberty protections do not apply. The standard of proof for civil forfeiture is considerably lower than the criminal standard, in that the government must only prove by a preponderance of the evidence, rather than beyond a reasonable doubt, that the property in question was used or obtained illegally.

Forfeiture programs, particularly civil forfeiture, have received increased scrutiny in recent years, with news reports of individuals facing the loss of a home or property without ever being charged with a crime, while fighting to keep their property in a system they claim is stacked against them. Challenging civil forfeiture can be costly and time consuming, which can discourage citizens from initiating the process to retrieve their property.

Proponents of forfeiture programs claim asset forfeiture is an important law enforcement tool that assists in dismantling criminal organizations and offsets the cost of criminal investigations. Opponents of these programs argue that they lead to potential corruption, improper usage, and civil liberty violations.

Critics of forfeiture programs claim the programs create financial incentives for officers to seize assets, which cause "policing for profit." Law enforcement agencies that participate in a forfeiture are directly rewarded for their involvement, which creates concerns that officers will focus more on crimes that result in seized assets than on any other activity. With many law enforcement agencies facing shrinking budgets, there is also concern that departments become dependent on forfeiture money, which in turn creates pressure on officers to seize assets. Critics also claim that these programs have resulted in fishing expeditions for cash and specific valuables during traffic stops and warrantless searches of vehicles.

Another criticism of these programs is that the money is used to purchase items that are unnecessary, wasteful, or contribute to the militarization of police forces. Although replacing bullet-proof vests for officers may seem to be a reasonable purchase, others question the merits of small-town police forces owning Humvees, automatic weapons, or gas grenades purchased with forfeiture proceeds.

While the laws in some jurisdictions allow a seizing agency to retain the proceeds from forfeited property, Maryland law requires that the proceeds from forfeitures processed under State law be deposited into the general fund of the State or the appropriate local government.

Federal Asset Forfeiture Program: The U.S. Department of Justice (DOJ) Asset Forfeiture Program (AFP) was established by the Comprehensive Crime Control Act of 1984. The program's objective is the seizure and forfeiture of assets that represent the proceeds of, or were used to facilitate, federal crimes. The U.S. Marshals Service, under DOJ, is responsible for the management and disposal of forfeited property. Other components of DOJ involved in the AFP include the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF); the Drug Enforcement Administration (DEA); the Federal Bureau of Investigation (FBI); and the U.S. Attorneys' Offices. Participating components outside of DOJ include the U.S. Department of Agriculture (Office of Inspector General), U.S. Department of Defense (Criminal Investigative Service), U.S. Department of State (Bureau of Diplomatic Security), U.S. Food and Drug Administration (Office of Criminal Investigations), and the U.S. Postal Inspection Service (USPIS).

Under the federal Equitable Sharing Program, the net proceeds from sales of forfeited assets are shared with the state and local law enforcement agencies that participated in the seizure. There are two options for state and local forfeitures: joint investigative and adoptive. Joint investigative forfeitures occur when federal law enforcement agencies cooperate with state or local law enforcement agencies to seize assets; adoptive forfeitures occur when state and local law enforcement agencies forfeit assets from state crimes to be processed at the federal level. DOJ advises that adoption cases represent a small percentage of the Equitable Sharing Program; joint task forces and joint investigations represent the majority of the program. The FBI, DEA, ATF, and USPIS are the only

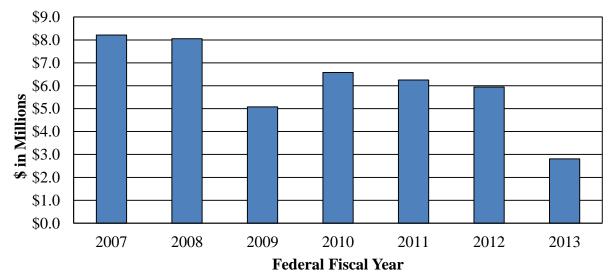
agencies participating in the DOJ Asset Forfeiture Program that directly adopt seizures by state and local law enforcement agencies.

According to DOJ, with respect to joint investigations and adoptions, the percentage of funds shared is based on the level of participation/effort of each agency and is determined on a case-by-case basis. Joint task forces often determine sharing percentages based on prearranged written sharing agreements. In adoption cases, the federal government retains at least 20% of the net proceeds from the sale of an adopted asset. This 20% minimum typically applies to cases in which the state/local law enforcement agency performed all of the preseizure activity and the federal government merely processed the forfeiture.

In October 2014, the Department of State Police (DSP) advised that it processes all of its forfeitures through the AFP.

In federal fiscal year 2013, State and local law enforcement agencies in Maryland received \$2.8 million in Equitable Sharing payments from the DOJ Asset Forfeiture Fund (AFF). Local law enforcement agencies received \$2.25 million, or 80.3% of this amount. **Exhibit 1** shows the amount Maryland received from the AFF from federal fiscal 2007 to 2013. According to the Equitable Sharing Program, AFF money may only be used for specific law enforcement purposes, such as investigative support, training, equipment, facility upgrades, and educational programs. Funding is usually used for one-time purposes and is meant to supplement, not supplant, law enforcement agencies' budgets.

Exhibit 1
U.S. Department of Justice Assets Forfeiture Fund
Amount Shared with Maryland Law Enforcement Agencies
Federal Fiscal Years 2007-2013



Source: U.S. Department of Justice and National Conference of State Legislatures

On January 16, 2015, U.S. Attorney General Eric Holder issued an order, effective immediately, prohibiting federal agencies from "adopting" assets seized by state and local law enforcement agencies. However, the order contains an exception for property that directly relates to public safety concerns (*e.g.*, firearms, ammunition, explosives, and property associated with child pornography). Examples of property subject to the order include vehicles, valuables, cash, and other monetary instruments.

The U.S. Department of the Treasury issued a similar policy for its forfeiture programs.

State Fiscal Effect:

Revenues from Forfeitures

General fund revenues decrease to the extent that the bill's changes to the seizure and forfeiture process under State law decreases the amount of property seized by and forfeited to State law enforcement agencies.

As previously mentioned, proceeds from property forfeited and processed under Maryland law must be deposited into the State's general fund or the general fund of the applicable local government. Under the federal Equitable Sharing Program, State and local law enforcement agencies can seize property under State law and request that a federal agency take the seized asset and forfeit it under federal law. The bill prohibits a seizing authority or prosecuting authority from directly or indirectly transferring seized property to a federal law enforcement authority unless the case is prosecuted in the federal court system under federal law. The U.S. Attorney General's recent order essentially produces the same effect.

As previously mentioned, DSP advised in October 2014 that it processed seized assets exclusively through the federal AFP. The Natural Resources Police (NRP) within the Department of Natural Resources (DNR) advises that it participates in the federal Equitable Sharing Program as a member of federal task forces. Other than this information, it is unclear to what extent local law enforcement agencies in the State participate in the federal program, the frequency with which they participate or plan to participate in the federal program following the Attorney General's January 2015 order, and to what extent they would seize and forfeit assets under State law given the changing landscape of forfeitures after the Attorney General's order and the provisions of the bill.

Regardless, to the extent that law enforcement agencies seize and forfeit assets under State law, the bill's restrictions on the types of property that may be seized and the bill's changes to the "rebuttable presumption" in forfeiture proceedings may reduce State general fund revenues from forfeiture proceeds. The magnitude of any such decrease cannot be reliably determined at this time because data is not readily available on the frequency with which the property affected by the bill's restrictions is seized by local authorities.

This analysis assumes that agencies are in compliance with the bill's requirements when they seize property as part of a federal task force.

Costs to Comply with the Bill's Reporting Requirements

General fund expenditures increase by at least \$95,281 in fiscal 2016 for various State agencies to comply with the bill's reporting requirements, as discussed below. Future year expenditures reflect annualization and inflation. Any costs to comply with the bill's reporting requirements end on September 30, 2018, due to the termination of these provisions.

Governor's Office of Crime Control and Prevention

General fund expenditures for GOCCP increase by \$58,665 in fiscal 2016, which accounts for the bill's October 1, 2015 effective date. This estimate reflects the cost of hiring one full-time and one part-time contractual data analyst to compile and analyze data and write the required annual reports. It includes salaries, fringe benefits, one-time start-up costs, and ongoing operating expenses.

Total FY 2016 GOCCP Expenditures	\$58,665
Other Operating Expenses	878
Additional Equipment	8,570
Salaries and Fringe Benefits	\$49,217
Contractual Positions	1.5

This estimate does not include any health insurance costs that could be incurred for specified contractual employees under the State's implementation of the federal Patient Protection and Affordable Care Act.

Future year expenditures reflect full salaries with annual increases and employee turnover as well as annual increases in ongoing operating expenses. Future year expenditures for GOCCP terminate on September 30, 2018, due to the termination of the reporting requirement. It is assumed that GOCCP can handle any final administrative duties related to the reporting requirement with existing resources after the contractual employees are terminated.

The bill authorizes MSAC to recoup its costs by charging a fee to law enforcement agencies that engage in seizures or forfeitures during the reporting period. Because the bill does not require MSAC to set a fee, and the number of State and local law enforcement agencies that may be subject to a fee in any given year is unknown, any general fund revenues generated as a result of the fee cannot be reliably quantified, and it is unknown if fee revenue could fully offset costs.

Department of Natural Resources

General fund expenditures for DNR increase by \$36,616 in fiscal 2016, which accounts for the bill's October 1, 2015 effective date. This estimate reflects the cost of hiring one full-time contractual civilian administrative officer for NRP to meet the bill's reporting requirements. It includes a salary, fringe benefits, one-time start-up costs, and ongoing operating expenses.

Total FY 2016 DNR Expenditures	\$36,616	
Other Operating Expenses	439	
Additional Equipment	4,285	
Salary and Fringe Benefits	\$31,892	
Contractual Position	1	

This estimate does not include any health insurance costs that could be incurred for specified contractual employees under the State's implementation of the federal Patient Protection and Affordable Care Act.

Future year expenditures reflect a full salary with annual increases and employee turnover as well as annual increases in ongoing operating expenses. Future year expenditures for DNR terminate on April 11, 2018, due to the termination of DNR's responsibilities under the bill's reporting requirement. Law enforcement agencies must submit seizure and forfeiture data to MSAC each year until 2018. This data must be submitted to MSAC so that MSAC is able to post the information submitted by law enforcement agencies on its website by March 1 during the years 2016 through 2018. It is assumed that DNR can handle any final administrative duties related to reporting seizure and forfeiture data with existing resources after the contractual employee is terminated.

NRP currently has three officers who are assigned to three different federally led task forces. Two are under the control of DEA and one task force is under the lead of Homeland Security Investigations. NRP does participate in the federal equitable sharing of seized funds and property that result from these task force seizures.

NRP does not provide an annual report on the types of information included in the bill's reporting requirements. NRP advises that it cannot meet the bill's reporting requirements with existing personnel, since the bulk of the reporting duties would fall on a Sergeant who supervises the Covert Operations Section, in which the NRP's task force officers work.

NRP advises that it cannot predict or count on any of the seized forfeiture proceeds to cover the cost to hire a civilian to maintain these records and compile the annual report because the agency cannot predict on how many forfeited proceeds (funds) will come into the agency each year.

Maryland Department of Transportation

The Maryland Department of Transportation (MDOT) advises that it can comply with the bill's reporting requirements with existing budgeted resources. MDOT has historically advised that the Maryland Transportation Authority police already track information required to be reported under the bill, while the Maryland Transit Administration (MTA) police do not. However, as part of the Statewide Computer Aided Dispatch/Records Management System project, the MTA Police Force has recently implemented an Evidence Control Unit that provides the police force with the area and personnel necessary to catalog any seized property that comes into the MTA Police Force.

Other Agencies and MSAC Fees

Additional expenditures may be incurred by other State law enforcement agencies through September 30, 2018, to meet the bill's reporting requirements.

PTC advises that the bill's responsibilities relating to an agency's failure to comply with annual reporting requirements can be met with existing budgeted resources.

DSP advises that the bill's impact is procedural and can be handled with existing budgeted resources.

The bill has no operational or fiscal impact on the Judiciary.

The estimates provided above for the various affected State law enforcement agencies do not include any costs to pay any fees established by MSAC.

Agencies May Be Able to Cover Costs with Forfeiture Proceeds

Any State law enforcement agency that is affected by the bill, including DNR, may use forfeiture proceeds to pay for the cost of compiling and reporting the required data, including the costs of any fee imposed by MSAC. The extent to which proceeds from seizures and forfeitures are redirected under the bill for these purposes is unknown, but could help offset the expenditures of affected agencies during the years in which the reporting requirements are effective.

Local Revenues: Local revenues decrease to the extent that the bill's alteration of seizure/forfeiture eligibility and procedures reduces the amount of property seized by and forfeited to local law enforcement agencies.

The Montgomery County Police Department (MCPD) advises that the bill has the potential to reduce the amount of revenue available to the department (which is used to support the department's needs related to drug enforcement) by restricting items subject to seizure.

MCPD advises that it is impossible to quantify the fiscal impact because the department cannot predict the scope of future investigations and the corresponding impact of the bill's proposed changes to seizures and forfeitures. MCPD also advises that many drug investigations involve multiple agencies as part of local, State, or federal task forces, and in those cases, forfeited assets are divided between the participating agencies

Local Expenditures: The bill's effect on local expenditures for law enforcement agencies likely varies by agency and depends largely on an agency's participation in seizure and forfeiture efforts and existing staffing levels.

Although the bill allows the cost of the bill's reporting requirements to be met with the use of proceeds from forfeitures, the extent to which local law enforcement agencies already use those proceeds for other purposes is unknown. Thus, local law enforcement agencies may be negatively affected and the bill's provisions may effectively impose a mandate.

The State's Attorneys' Association advises that the bill does not impact prosecutors.

Additional Information

Prior Introductions: None.

Cross File: SB 528 (Senator Raskin, et al.) - Judicial Proceedings.

Information Source(s): Montgomery County, Town of Leonardtown, Governor's Office of Crime Control and Prevention, Department of Natural Resources, Judiciary (Administrative Office of the Courts), Department of State Police, Department of Public Safety and Correctional Services, State's Attorneys' Association, Maryland Department of Transportation, U.S. Department of Justice, U.S. Department of Treasury, Department of Legislative Services

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